

**CASTELLÓN & FUNDERBURK LLP**A LIMITED LIABILITY PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

January 17, 2012

Via U.S. Mail & E-Mail

Ms. Michelle Kerr
Remedial Project Manager
U.S. Environmental Protection Agency – Region 5
Superfund Division (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590
kerr.michelle@epa.gov

Re: **U.S. EPA General Notice and Information Request for the
Chemetco Superfund Site in Hartford, Illinois**

Dear Ms. Kerr:

We respond on behalf of Metal Briquetting Company (“MBC”) which received the U.S. EPA’s November 30, 2011 General Notice Letter and Information Request regarding the Chemetco Superfund Site in Hartford, Illinois. MBC hereby expresses its interest in participating in future negotiations with U.S. EPA, without admitting liability and subject to a full reservation of all rights.

MBC is also a member of the Institute of Scrap Recycling Industries, Inc. (“ISRI”). Several ISRI members that received U.S. EPA’s notice letter, including MBC, are participating in an organizational meeting in Chicago on January 31, 2012. As of last Friday, ISRI members began to receive your follow-up letter containing USEPA’s informational CD referenced in the December 20, 2011 meeting at Region 5. Consequently, we are just starting to review its contents. Additionally, MBC, along with other ISRI members, who received the notice letter have not yet had an opportunity to review the voluminous documents (including site-nexus documents) that are presently stored on the 7th Floor of U.S. EPA’s offices in Chicago and at the Hartford Public Library in Hartford, Illinois.

For all of the above-listed reasons, we hereby request an extension of the time to respond to the request for information until April 3, 2012.

In addition, in your letter dated January 12, 2012, you indicated that U.S. EPA would like to meet in February to discuss moving forward with an Administrative

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Order on Consent ("AOC"). For the reasons stated herein and to help facilitate a coordinated group response to the U.S. EPA, MBC believes it will be productive for ISRI members to meet again as a group following the date (as may be extended) for responding to U.S. EPA's pending requests for information.

We therefore ask that U.S. EPA schedule its follow-up meeting on or after May 3, 2012 or at least one month following the deadline to respond to requests for information so that ISRI members can further meet. As this site has been under the scrutiny of either the Illinois EPA or the U.S. EPA for almost 30 years, a brief addition of time to allow for a coordinated and comprehensive response by ISRI members (and others) seems both reasonable and appropriate.

Thank you in advance for considering our request. Please let us know when you plan to schedule a meeting. In the meantime, I expect some of us will talk with you further about timing following our scheduled January 31st meeting.

Very truly yours,



William W. Funderburk

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